



March 10, 2017

Project No. 8128.02.02

Dana Bayuk

Oregon Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, Oregon 97232

Re: Monthly Progress Report—February 2017

Siltronic Corporation

7200 NW Front Avenue, Portland, OR

Order No. ECVC-NWR-00-27

Dear Dana:

The *Order Requiring Remedial Investigation and Source Control Measures*, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. The current reporting period is February 1, 2017, through February 28, 2017. The next progress report is due April 15, 2017.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm the Source Control Evaluation, (SCE) work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. DEQ has recently informed Siltronic that all SCE work is to be completed in one workplan. As such, future work related to the SCE will be provided in this MPR related to the 2000 Joint Order. In doing so, Siltronic believes that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and 2016 Unilateral Order concerning activities undertaken on the SOU, while also meeting DEQ's request that the SCE work be conducted under a single workplan. Therefore, the 2000 Order Monthly Progress Reports will include the SCE efforts and those activities related to the Gasco Operable Unit (GOU)-Allen property.

ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT

Communications and Submittals

On February 8, 2017, Maul Foster & Alongi, Inc. (MFA) submitted a monthly progress report to DEQ for work performed on Siltronic's behalf in January 2017 pursuant to the 2000 Joint Order.

On February 15, 2017, Siltronic received a letter from DEQ providing comments on the Source Control Evaluation Work Plan produced by MFA for the GOU-Allen property (SCE Work Plan) dated December 23, 2016.

On February 16, 2017, MFA and DEQ conducted a telephone discussion regarding slug testing methods necessary for completing hydraulic conductivity testing at three Fill Water Bearing Zone (WBZ) wells. During the call, DEQ provided verbal approval for the testing methods proposed by MFA, and authorized implementation of the work.

On February 17, 2017, DEQ provided written approval via e-mail to implement the Fill WBZ slug testing according to the methods proposed by MFA and refined by DEQ during the February 16, 2017, phone call between DEQ and MFA.

On February 17, 2017, in accordance with a request made by DEQ during its February 16, 2017 phone call with MFA, MFA provided DEQ with a list of wells instrumented with water level transducers maintained by Siltronic.

On February 28, 2017, MFA met with Dana Bayuk and Alex Liverman of DEQ to discuss DEQ's comments concerning the SCE Work Plan produced on Siltronic's behalf by MFA.

Fieldwork

On February 7, MFA conducted bimonthly thickness measurements of Portland Gas & Coke (PG&C) waste dense nonaqueous-phase liquid (DNAPL) in WS-15-85, WS-33-81, and WS-43-36.

On February 9, MFA collected bimonthly soil vapor samples consistent with the ongoing performance monitoring program required by DEQ.

On February 9, MFA conducted overland flow pathway observations supporting the stormwater portion of the source control evaluation.

On February 10, MFA collected bimonthly combustible-gas measurements supporting the ongoing performance monitoring program, as required by DEQ.

On February 13 and 14, MFA conducted monitoring of Siltronic groundwater wells, consistent with the performance monitoring program.

During February, Siltronic provided access, as necessary, to representatives of NWN for work associated with the NWN source control measures.

ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS

Communications and Submittals

Siltronic anticipates submitting the revised SCE Work Plan to DEQ on or before March 17, 2017.

Fieldwork

March field activities will include groundwater performance monitoring and data collection from transducers installed in selected monitoring wells.

April field activities will include quarterly water level measurements; bimonthly PG&C waste DNAPL thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly and semiannual vapor sampling.

MFA anticipates implementing slug testing at three Fill WBZ wells (WS-44-29, WS-45-23, and WS-46-33) as approved by DEQ.

Additional overland flow pathway and groundwater intrusion pathway observations will be conducted.

TEST RESULTS AND DATA RECEIVED

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

PROBLEMS EXPERIENCED OR RESOLVED

No problems were experienced during the reporting period.

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Please call either of us at (971) 544-2139 if you have questions or comments.

Sincerely,

Maul Foster & Alongi, Inc.



Michael Murray, RG, EIT
Project Hydrogeologist



Madi Novak
Principal Environmental Scientist

Attachments/enclosures: MS Excel file (as attachment to the e-mail and on CD with the hard copy)

cc: Myron Burr, Siltronic
Ilene M. Munk, Foley & Mansfield
Chris Reive and David Rabbino, Jordan Ramis
Dana Bayuk, DEQ
Keith Johnson, DEQ
Henning Larsen, DEQ
Matt McClincy, DEQ
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Halah Voges, Anchor QEA LLC
Taku Fuji, Anchor QEA LLC
Rob Ede, Hahn and Associates, Inc.

ATTACHMENT

MS EXCEL FILE

